

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

United States of America,)
)
Plaintiff,) Case No. 1:21-cr-00130
)
v.)
)
Jacob Bradley Demarais,) **MOTION TO MODIFY**
Defendant.) **PRETRIAL RELEASE**

[1] COMES NOW, Defendant, Jacob Bradley Demarais, by and through his attorney, Patrick Brooke, moves the Court to modify his pretrial release in the above-referenced case.

[2] The Court has allowed Mr. Demarais to reside with his uncle, Mark Demarais, in Coleraine, Minnesota while on pretrial release and attending outpatient treatment programming at Alpha Human Services. *See Doc. ID #30 at ¶¶ 12-14.* The Undersigned has been contacted by his pretrial services officer in Minnesota with a request for the Court to allow for Mr. Demarais to reside with his aunt, Denise Mattson. Pretrial services have been in contact with Denise who resides in the country with 6 acres and has agreed to remove internet and smart TV access from her home. She will be allowed to keep her smartphone with the condition she have it passcode protected and not allow Mr. Demarais access to it. Pretrial services have requested they transition Mr. Demarais to his aunt's residence on July 27, 2022. Should the Order from the Court not come through in time, the transition will not take place until August 8, 2022. AUSA Delorme has been consulted and indicated he does not oppose the motion.

[3] Mr. Demarais requests he be allowed to reside with his aunt under the same conditions as his current pretrial release order contains.

Dated this 26th day of July, 2022.

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